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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$147,140.00 IN
U.S. CURRENCY,

15 Defendant.
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VERIFIED COMPLAINT FOR
FORFEITURE *IN REM*

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18 The United States of America, by and through its undersigned attorney, brings this complaint
19 and alleges as follows in accordance with Supplemental Rule G(2) of the Supplemental Rules for
20 Admiralty or Maritime Claims and Asset Forfeiture Action:

21 **NATURE OF ACTION**

22 1. This is a civil action *in rem* to forfeit to the United States Approximately \$147,140.00 in
23 U.S. Currency (hereafter “defendant currency”) involved in violations of federal drug laws.

24 2. The defendant currency was seized from Juan Martin Del Toro (“Del Toro”) on
25 November 17, 2020 in Sacramento, California. The defendant currency is in the custody of the United
26 States Marshals Service, Eastern District of California.

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JURISDICTION AND VENUE

3. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, over an action for forfeiture under 28 U.S.C. § 1355(a), and over this particular action under 21 U.S.C. § 881.

4. This district is a proper venue pursuant to 28 U.S.C. § 1355 because the acts giving rise to this *in rem* forfeiture action occurred in this district, and pursuant to 28 U.S.C. § 1395 because the defendant currency was seized in this district.

FACTUAL ALLEGATIONS

5. In 2016, the Federal Bureau of Investigation received information regarding Del Toro's alleged involvement in tax crimes. The allegations focused on Del Toro's auto body shops potentially serving as fronts for illicit funds, resulting in possible misstatements of his income reported to federal and state taxing authorities.

6. During the investigation, the FBI developed information indicating that Martin's Auto Body and Towing, a Sacramento body shop owned by Del Toro, was an alleged stash location for methamphetamine. Further, FBI agents learned that a Del Toro family member allegedly received pound quantities of methamphetamine at Unique Auto Shop in Sacramento, another business owned by Del Toro.

7. On February 2, 2018, a confidential source ("CS") working for the FBI negotiated the purchase of methamphetamine and was told to pick up the drugs at Unique Auto Shop, one of Del Toro's businesses. The CS arrived at Unique Auto and Del Toro's relative walked out to the CS's car to greet him. Del Toro's family member told the CS that "the guy" is busy, and that he would call the CS when the items were ready for pickup. The family member later phoned the CS and indicated things looked suspicious. The family member then postponed the drug buy to a later time.

8. On November 17, 2020, law enforcement executed search warrants at several properties and businesses associated with Del Toro in Sacramento. At Del Toro's residence, law enforcement seized stacks of cash hidden throughout nearly every room in the house, including \$12,000 in a black plastic bag on the kitchen counter and \$70,030 in a purse hidden in a closet. In the master bedroom, law enforcement found \$40,400 in a "Bank of America" bag, \$5,000 in a bin, and \$5,477 in Del Toro's

wallet. In total, law enforcement found \$147,140.00 in cash—the defendant currency.

FIRST CLAIM FOR RELIEF
21 U.S.C. § 881(a)(6)

9. The above paragraphs are incorporated by reference as though fully set forth herein.

10. The defendant currency is subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(6) because it was money furnished or intended to be furnished in exchange for a controlled substance or listed chemical, constituted proceeds traceable to such an exchange, and was used and intended to be used to commit or facilitate a violation of 21 U.S.C. §§ 841, *et seq.*, an offense punishable by more than one year's imprisonment.

PRAYER FOR RELIEF

WHEREFORE, the United States prays that:

1. Process issue according to the procedures of this Court in cases of actions *in rem*;

2. Any person having an interest in said defendant currency be given notice to file a claim and to answer the complaint;

3. The Court enter a judgment of forfeiture of the defendant currency to the United States; and,

4. The Court grant such other relief as may be proper.

DATED: 7/11/2025

MICHELE BECKWITH
Acting United States Attorney

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

VERIFICATION

I, Laura Cuthbert, hereby verify and declare under penalty of perjury that I am a Special Agent with the Federal Bureau of Investigation, that I have read the foregoing Verified Complaint for Forfeiture *In Rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to the best of my knowledge and belief.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, including information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Special Agent with the Federal Bureau of Investigation.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Dated: 7/11/2025

/s/ Laura Cuthbert
LAURA CUTHBERT
Special Agent
Federal Bureau of Investigation
(Signature retained by attorney)